

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DELAWARE MARKETING PARTNERS,
LLC, a Delaware limited liability company,

Plaintiff

CA No.: 04-263

v.

JUDGE McLAUGHLIN AND
MAGISTRATE JUDGE
SUSAN PARADISE BAXTER

CREDITRON FINANCIAL SERVICES,
INC, a Pennsylvania corporation, and,
TELATRON MAKETING GROUP, INC.,
a Pennsylvania corporation,

TRIAL BY JURY DEMANDED

Electronically Filed

Defendants

**CONSENTED TO MOTION TO REVISE
CASE MANAGEMENT ORDER**

AND NOW, comes the Plaintiff, by and through its attorneys, Dickie, McCamey & Chilcote, P.C., and files the following Consented to Motion to Revise Case Management Order, respectfully representing as follows:

1. This matter involves a contract dispute that was transferred by the U.S. District Court for the District of Delaware to this Honorable Court.
2. On November 9, 2005 this Court entered a Revised Case Management Order which directed that discovery conclude by December 26, 2005.
3. On November 17, 2005, Plaintiff filed a Motion to Compel Discovery Responses pertaining to Defendants' outstanding discovery responses to Plaintiff's discovery requests. On

November 30, 2005 this Court entered an Order that Defendants would have until December 9, 2005 to respond to the Motion to Compel.

4. On December 9, 2005 Defendants responded to the Motion to Compel. Thereafter, on December 12, 2005 the Court entered an Order that Defendants had until January 13, 2006 to respond to Plaintiff's discovery requests. The Order did not address any other deadlines set forth in the November 9, 2005 Revised Case Management Order.

5. On Friday, January 13, 2006 Defendants Provided Answers to Plaintiff's First Set of Interrogatories and Requests for Production of Documents. Further, on Friday, January 13, 2006 Defendants forwarded documents in response to the Requests for Production which Plaintiff's counsel received on Tuesday January 17, 2006.

6. Plaintiff's counsel must review the voluminous documents recently produced and anticipates the filing of third party subpoenas and taking of third party depositions in this matter.

7. Further, the parties were recently advised of scheduling conflicts on the part of witnesses necessary to be deposed in this matter that require a revision to the scheduling order. In fact, one of Defendants' representatives is unable to be deposed for at least four weeks due to maternity leave.

8. The parties need additional time to facilitate discovery in this matter.

9. Defendant consents to this Motion to Revise Case Management Order.

10. The parties respectfully request that this Honorable Court enter an Order revising the Case Management Order so as to provide an additional one hundred eighty (180) days for pretrial discovery and extending all other deadlines accordingly.

WHEREFORE, the parties respectfully request that this Honorable Court issue an Order revising the Case Management Order of November 9, 2005.

Respectfully submitted,

DICKIE, McCAMEY & CHILCOTE, P.C.

By s/Brett W. Farrar

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